

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

FREEDOM COALITION OF DOCTORS FOR  
CHOICE,

Plaintiff,

-against-

CENTERS FOR DISEASE CONTROL AND  
PREVENTION, AND DEPARTMENT OF  
HEALTH & HUMAN SERVICES,

Defendants.

Civil Action No. 2:23-cv-00102

**PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Freedom Coalition of Doctors for Choice, now moves for summary judgment against all claims and causes of action asserted by Plaintiff. In support of its Motion, Plaintiff has concurrently filed its Brief in Support of Motion for Summary Judgment (“**Brief**”) that sets forth the facts, arguments, and authorities that substantiate summary judgment. *See* Local Rule 56.5(a). Pursuant to Local Rule 56.3(b), the contents of the motion required by Local Rule 56.3(a)(1) will be set forth in Plaintiff’s Brief. Also in support of its Motion, Plaintiff has filed a separate Appendix that contains the evidentiary materials relied upon for summary judgment. *See* Local Rule 56.6. Citations to the Appendix that support Plaintiff’s Motion are also contained in Plaintiff’s Brief. *See* Local Rule 56.5(c). Based on the facts, arguments, and authorities contained in Plaintiff’s Brief, along with the materials contained in the supporting Appendix, there is no genuine dispute as to any material fact and Plaintiff is entitled to judgment as a matter

of law. Plaintiff, therefore, respectfully requests that the Court enter summary judgment in favor of Plaintiff.

Dated: July 11, 2023

/s/ John C. Sullivan

John C. Sullivan

S|L LAW PLLC

Texas Bar Number: 24083920

610 Uptown Boulevard, Suite 2000

Cedar Hill, Texas 75104

(469) 523-1351 (v)

(469) 613-0891 (f)

[john.sullivan@the-sl-lawfirm.com](mailto:john.sullivan@the-sl-lawfirm.com)

/s/Christopher Wiest

Christopher Wiest (pro hac vice)

Chris Wiest, Atty at Law, PLLC

25 Town Center Boulevard, Suite 104

Crestview Hills, KY 41017

(513) 257-1895 (c)

(859) 495-0803 (f)

[chris@cwiestlaw.com](mailto:chris@cwiestlaw.com)

*Attorneys for Plaintiff*

#### CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing upon the Defendants, through CM/ECF, and by ordinary U.S. mail to the parties and their Counsel, this 11 day of July, 2023.

/s/Christopher Wiest